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7	RONIS SAGASTUME	
8	HAMMED STRATE	C DICEDICE COURT
9	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA	
10	NORTHERN DISTRICT OF CALIFORNIA	
11	RONIS SAGASTUME,	Civ. Case No. 15-CV-04350-VC
12	 	REQUEST FOR DISMISSAL
13	V.	
14		
15	DEL MONTE FRESH PRODUCE (WEST COAST), INC.; DEL MONTE FRESH	
16	PRODUCE, N.A., INC.; TRICONT	
	TRUCKING COMPANY; and DOES 1 THROUGH 20, inclusive,	
17	TTIKOCOTI 20, liciusive,	
18	Defendants.	
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21		
22	Plaintiff Ronis Sagastume ("Plaintiff") respectfully requests this Court dismiss the	
23	above-captioned action, with each side to bear his/its own fees and costs, pursuant to th	
24	Federal Rules of Civil Procedure ("FRCP") Rule 41(a)(2). Plaintiff's First, Second, Third	
25	Fourth, Fifth, Sixth, Seventh, Eighth, Ninth, Tenth, Eleventh, Twelfth, Fourteenth and Fifteent	
26	causes of action in the Second Amended Complaint shall be dismissed with prejudice as to a	
27		
28	parties. Plaintiff's Thirteenth cause of action alleging violation of the Labor Code Privat	

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Attorneys General Act of 2004 ("PAGA") shall be dismissed with prejudice as to Plaintiff on 1 2 his own behalf, and without prejudice as to the claim brought on behalf of others. 3 Dated: July 26, 2016 KLETTER + NGUYEN LAW LLP 4 5 By: ____/s/ 6 Cary Kletter Sally Trung Nguyen 7 Attorneys for PLAINTIFF MIRIAM ANDRADE 8 9 POSED ORDER 10 Based upon Plaintiff's request for dismissal with prejudice of the above-captioned 11 action, IT IS HEREBY ORDERED AS FOLLOWS: 12 13 1. Pursuant to FRCP 41(a)(2), this action is dismissed as to all parties with prejudice as to 14 the First, Second, Third, Fourth, Fifth, Sixth, Seventh, Eighth, Ninth, Tenth, Eleventh, 15 Twelfth, Fourteenth and Fifteenth causes of action in the Second Amended Complaint; 16 2. Pursuant to FRCP 41(a)(2), this action is dismissed without prejudice as to the 17 Thirteenth cause of action alleging PAGA violations as to others and with prejudice as 18 19 to Plaintiff individually; 20 3. Each of the parties is to bear his/its own attorney's fees and costs; and 21 4. The Court retains jurisdiction over the parties to enforce the terms of any Settlement 22 Agreement. 23 IT IS SO ORDERED. 24 Dated: July 28, 2016 25 HONORABLE VINCE CHHABRIA UNITED STATES DISTRICT COURT JUDGE 26 27

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